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MUNICIPAL SERVICES BUREAU

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

REED SAILOLA,)	CIVIL NO. 13-00544 HG RLP
)	
Plaintiff,)	DEFENDANT MUNICIPAL
)	SERVICES BUREAU'S MOTION
vs.)	TO AMEND SCHEDULING
)	ORDER TO PERMIT FILING OF
MUNICIPAL SERVICES BUREAU and)	DISPOSITIVE MOTIONS AND
JOHN DOES 1-50,)	TO RESET TRIAL DATE;
)	MEMORANDUM IN SUPPORT
Defendants.)	OF MOTION; DECLARATION OF
)	COURTNEY K. SUE-AKO;
)	EXHIBIT "A"; CERTIFICATE OF
)	SERVICE

DEFENDANT MUNICIPAL SERVICES BUREAU'S
MOTION TO AMEND SCHEDULING ORDER TO PERMIT
FILING OF DISPOSITIVE MOTIONS AND TO RESET TRIAL DATE

Defendant Municipal Services Bureau ("MSB"), by and through its
attorneys, McCorriston Miller Mukai MacKinnon LLP, hereby respectfully moves

this Court for an order amending the Rule 16 Scheduling Order filed January 21, 2014, to extend the September 3, 2014 deadline for the parties to file dispositive motions. Plaintiff filed his First Amended Complaint per order of this Court on August 14, 2014. MSB filed its Answer to the First Amended Complaint on August 28, 2014. Although the parties have taken limited discovery, further discovery is pending. Because the results of further potential discovery may provide a basis for dispositive motions and narrow issues for trial, and because MSB has not had a reasonable opportunity to prepare a dispositive motion based on Plaintiff's First Amended Complaint, MSB respectfully requests that the Rule 16 Scheduling Order be amended and the dispositive motion deadline be reset and the trial date be continued.

This Motion is brought pursuant to Rules 7 and 16 of the Federal Rules of Civil Procedure and is based upon the attached Memorandum in Support of Motion, declaration of counsel, and the records and files herein.

DATED: Honolulu, Hawai'i, September 3, 2014.

/s/ David J. Minkin

DAVID J. MINKIN

COURTNEY K. SUE-AKO

Attorneys for Defendant

MUNICIPAL SERVICES BUREAU